



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TAW/EMR/PP
F. #2019R00719

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 21, 2020

By ECF and FedEx

James Darrow, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, New York 11201

Re: United States v. Akiva Schonfeld
Criminal Docket No. 19-489 (S-2) (PKC)

Dear Mr. Darrow:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, Bates-numbered AS000033 - AS001483. This discovery supplements the government's disclosures on January 23, 2020 and July 8, 2020, and it includes material produced pursuant to the protective order issued by the Court on May 8, 2020. To the extent that transcripts have been provided for recordings, they have been provided pursuant to the stipulation signed by the parties on or about December 7, 2020. All translations and transcripts are drafts and subject to revision. The government will continue to produce discovery on an ongoing basis. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Enclosed are the following:

<u>Description</u>	<u>Bates Number</u>
Intercepted communications and accompanying draft transcripts (hereby designated PROTECTED MATERIAL)	Bates-numbered AS000033 - AS000083
Applications for electronic surveillance authorizations and orders authorizing electronic	Bates-numbered AS000084 - AS000931, AS001373 - AS001483

surveillance (hereby designated PROTECTED MATERIAL)	
Photographs taken on or about September 4, 2017 and September 5, 2017	Bates-numbered AS000932 - AS001038
Photographs taken on or about and between January 28, 2018 and January 30, 2018	Bates-numbered AS001039 - AS001208
Photographs taken on or about February 15, 2018	Bates-numbered AS001209 - AS001287
Photographs taken on or about February 25, 2018	Bates-numbered AS001288 - AS001361
Photographs taken on or about March 26, 2018	Bates-numbered AS001362 - AS001366
Records from Enterprise Rent-A-Car	Bates-numbered AS001367 - AS001368
Laboratory reports	Bates-numbered AS001369-AS001372

The government is also in possession of physical items, including (i) cocaine with an approximate net weight of 100 kilograms seized on or about September 4, 2017; (ii) cocaine with an approximate net weight of 67 kilograms seized on or about January 28, 2018; (iii) cocaine with an approximate net weight of 28 kilograms seized on or about January 28, 2018; (iv) heroin with an approximate net weight of 1.5 kilograms seized on or about March 26, 2018; (v) 32 firearms; (vi) Samsung Galaxy cellular telephone assigned call number (732) 552-8364; (vii) Samsung Galaxy cellular telephone assigned call number (848) 240-8040; and (viii) U.S. currency.

You may examine the physical evidence discoverable under Rule 16, including original documents, by calling us to arrange a mutually convenient time

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

II. Future Discussions

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

By: /s/
Temidayo Aganga-Williams
Erin M. Reid
Philip Pilmar
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)